

June 6, 2006

Harold W. Robbins  
Bison Engineering, Inc.  
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Helena, MT 59601

**Re: Comments on Montana's Draft CALPUFF Modeling Protocol for BART**

Dear Mr. Robbins:

Thank you for your recent comments on the draft Montana CALPUFF modeling protocol. As a reminder, the CALPUFF modeling protocol is not required to be formally adopted by the Montana Board of Environmental Review. However, the Department of Environmental Quality (Department) solicited public comment so that all interested parties had an opportunity to review and comment on the modeling protocol as it applies to BART.

The Department intends to use this CALPUFF guidance for all long range modeling submitted for BART, NSR, and PSD. The guidance will be posted along with the other modeling guidance on the Department's Air Resources Management Bureau web site (<http://www.deq.mt.gov/AirQuality/Visibility.asp>). The guidance will be subject to change as needed. Your participation in this process has given us a strong start.

Comments 1-2: Modeling Protocol Purpose/Legal Authority  
A new purpose has been added to the protocol for clarification.

Comment 3: Public Comment

The objective of the informal public comment period was to inform interested parties of the Department's intent regarding a specific program - in this case implementation of BART. No regulation requires this informal public comment period.

Comment 4: Modeling Flexibility and Options

As stated in the draft Montana BART modeling protocol: "The latest modeling techniques will be applied that are consistent with the EPA and federal land managers' (FLMs) recommendations and BART guidelines. The MDEQ may approve deviations from this protocol for a specific source that are documented in a modeling protocol and accepted by the EPA, if the model performance is improved while retaining consistency with the BART guidelines. All modeling analyses will be subject to MDEQ review and approval."

However, if new recommendations and/or CALPUFF model inputs/variables related to the BART process become available from the Environmental Protection Agency (EPA) or the FLMs, the Department will apply these changes to the BART modeling process as time, resources, and other relevant factors permit.

Comments 5-7: Grammatical Edits and Clarifications

All suggestions have been incorporated into the protocol.

Comment 8: CALPOST Inputs

EPA reviewed the draft Montana BART modeling protocol and supports the use of CALPOST Method 6 to determine changes in visibility. The application of Method 6 in CALPOST is consistent with EPA's BART guidelines and EPA's objectives for the Regional Haze program. Specifically, the monthly relative humidity adjustment factors are applied directly to the background and modeled sulfate and nitrate concentrations as recommended by EPA's BART guidelines.

As previously explained in the response to Comment 4 above, if new recommendations and/or CALPUFF model inputs/variables related to the BART process become available from EPA or the FLMs, the Department will apply these changes to the BART modeling process as time, resources, and other relevant factors permit.

If you have any questions or additional comments on the draft modeling protocol, please feel free to contact me at (406)444-7305 or e-mail at [bhabeck@mt.gov](mailto:bhabeck@mt.gov).

Sincerely,

Robert J. Habeck  
AQ Policies & Planning  
Science Program Supervisor  
Air Resources Management Bureau

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